

EXHIBIT A

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BY FAX AND FIRST CLASS MAIL

Beth Ann Smith
Office of Attorney General
21 S. 12th Street, 3rd Floor
Philadelphia, PA 19107-3603

RE: Inmates of the Pennsylvania Department of Corrections v. Pennsylvania
Department of Corrections, No. 02-2687

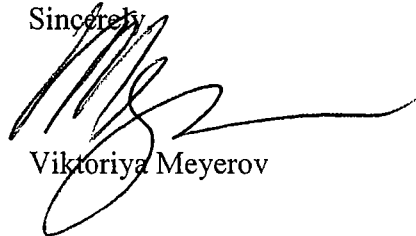
Dear Beth:

I write to advise you that Plaintiff would like to take depositions of all members of the Parole Board who participated in the decisions to deny Plaintiff's request for parole in 2001, 2002 and 2004. To that end, you will find enclosed several notices of deposition.

Because some of the members' signatures on the documents are illegible, I have not been able to determine with certainty which members of the Parole Board in 2001, 2002 and 2004 were involved on any level in considering Plaintiff's request for parole. As such, I have noticed depositions of all Defendants Board members. In the event that only some of them were actually involved in the decision-making process, I am prepared to accept your representation to that effect and to withdraw notices of depositions directed to those Defendants.

I am also cognizant of counsel's and clients' schedules. I am confident we can find time over the course of the next month, prior to the discovery deadline, to complete all necessary discovery efforts. Please let me know if Defendants wish to depose anyone other than Plaintiff.

Sincerely,



Viktoriya Meyerov

VM/dlm
Enclosures

Established
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